

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**UNITED STATES OF AMERICA**

**v.**

**TROY G. SKINNER,**

**Defendant.**

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**Case No. 3:19cr19  
Hon. M. Hannah Lauck**

**Defendant's Reply to Government's Response to his  
Motion to for Jury Questionnaire**

COMES NOW, the defendant, by counsel, and submits his reply to the government's response to his motion for a jury questionnaire, and restates his request that the jury be provided a questionnaire, not only to address the question of pretrial publicity, but also to be able to gain some perspective on the jury pool's viewpoints on the very sensitive issue of child pornography and the exploitation of children. A confidential and private jury questionnaire on these sensitive topics is far preferable to the open and public questioning during voir dire at the trial.

The government's response states that the requested questionnaire is unnecessary. Conceding that "the defendant's case initially received an above-average amount of publicity," the government does not address the defendant's concerns with the sensitive nature of child exploitation and pornography. Gov't Resp at 1-2. Rather, the government raises concerns with particular questions posed in the proposed questionnaire. The questions can be modified. To make efficient use of the Court's time, and to properly assess the perceptions, biases and prejudices of the jury pool, a proposed jury questionnaire should be administered.

Respectfully Submitted,  
**TROY G. SKINNER**

By: /s/  
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## CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2019, I filed the foregoing unredacted version of this pleading with the Clerk of the Court, and sent a notification of such filing to:

Brian Hood  
Katherine Martin  
US Attorney's Office  
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/s/

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